United States District Court Eastern District of Texas Tyler Division

| Mass Engineered Design, Inc. | Civil Action No. 6:14-cv-00414-RWS |
|------------------------------|------------------------------------|
| Plaintiff                    |                                    |
| v.                           |                                    |
| Planar Systems, Inc.         |                                    |
| Defendant                    |                                    |

## **Joint Motion to Continue Briefing Deadlines**

Plaintiff Mass Engineered Design, Inc., and Defendant Planar Systems, Inc. jointly move the Court for a continuance of the briefing deadlines for Mass' pending motion to compel against Planar. The parties respectfully request that:

- the Court continue Planar's deadline to oppose the motion to compel from June
  29, 2015 to July 6, 2015, and continue Mass' reply and Planar's sur-reply deadlines according to
  Local Rule CV-7(f); and
- 2. the Court shall retain jurisdiction and venue over Planar and this case until Mass' pending motion to compel is resolved.

A proposed order is submitted herewith.

Date: June 29, 2015

/s/ Jing Hong Cherng

Daniel S. Mount, Esq. (Cal. Bar No. 77517) Kathryn G. Spelman, Esq. (Cal. Bar No. 154512) Jing Hong Cherng, Esq. (Cal. Bar No. 265017) William H. Stewart, Esq. (Cal. Bar No. 287782) Mount, Spelman & Fingerman, P.C. RiverPark Tower, Suite 1650 333 West San Carlos Street

San Jose CA 95110-2740 Phone: (408) 279-7000

Fax: (408) 998-1473

Email: dmount@mount.com; kspelman@mount.com; dfingerman@mount.com

Counsel for Planar Systems, Inc.

/s/ Stephen F. Schlather\_

Stephen F. Schlather – Lead Counsel

Texas Bar No. 24007993

John J. Edmonds

Texas Bar No. 789758

Shea Palavan

Texas Bar No. 24083616

COLLINS, EDMONDS, POGORZELSKI,

SCHLATHER & TOWER, PLLC

1616 South Voss Road, Suite 125

Houston, Texas 77057

Telephone: (281) 501-3425

Facsimile: (832) 415-2535

sschlather@cepiplaw.com

jedmonds@cepiplaw.com

spalavan@cepiplaw.com

Counsel for Mass Engineered Designs, Inc.

## **Certificate of Service**

The undersigned certifies that on the date this document is electronically filed, all counsel of record who have consented to electronic service are being served with a copy of this document via the court's ECF system pursuant to Local Rule CV-5(a)(3)(C).

Dated: June 29, 2015

/s/Jing Hong Cherng